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**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

<p>In re:</p> <p>SOUTHERN INYO HEALTHCARE DISTRICT,</p> <p style="text-align: center;">Chapter 9 Debtor.</p> <hr/> <p>SOUTHERN INYO HEALTHCARE DISTRICT,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>HEALTHCARE CONGLOMERATE ASSOCIATES, LLC; VI HEALTHCARE FINANCE, INC.; and DOES 1 through 10,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.: 16-10015-A-9</p> <p>Chapter 9</p> <p><b>Adv. Case No.: 18-01031-A</b></p> <p>DCN: JSS-01</p> <p><u>Hearing</u></p> <p>Date: March 30, 2020 Time: 1:30 p.m. Place: Dept. A, 7<sup>th</sup> Floor United States Bankruptcy Court 501 I Street Sacramento, CA</p> <p>Judge: Honorable Fredrick E. Clement</p>
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**STIPULATION OF WITHDRAWAL OF MOTION FOR  
PRELIMINARY INJUNCTION AGAINST VI HEALTHCARE FINANCE, INC.,  
FOR SEQUESTRATION OF TAX REVENUES AND  
FOR DISMISSAL OF ADVERSARY CASE.**

COMES NOW, VI Healthcare Finance, Inc. (“Defendant”) and Southern Inyo Healthcare District (the “Debtor” or “Plaintiff”), by and through their counsel of record counsel (collectively the “Parties”), as hereby stipulation and agree as follows:

1           1.       On May 30, 2018, the Debtor filed its Complaint against Healthcare  
2 Conglomerate Associates, LLC and Vi Healthcare Finance, Inc., which matter is  
3 captioned above and bears adversary case number 18-01031-A (Doc. 1, the “Adversary  
4 Case”).

5           2.       On November 1, 2018, Plaintiff filed a Notice of Motion and Motion for  
6 Preliminary Injunction Against Vi Healthcare Finance, Inc., for Sequestration of Tax  
7 Revenues Pending Final Ruling on the Merits of this Adversary Case or Further Order of  
8 this Court ("Hearing") (Doc. 29, the “Preliminary Injunction Motion”).

9           3.       On December 5, 2018, the Parties agreed to sequester the tax revenues of  
10 Inyo County (the “Tax Revenues”) and protect distribution of those revenues to any party  
11 pending a determination of the Preliminary Injunction Motion (Doc. 45), and the Parties  
12 have continued that agreement from time to time, including through the next status  
13 conference on the Adversary Case now scheduled for March 9, 2020, at 1:30 p.m..

14           4.       On September 11, 2019, the parties participated in JAMS mediation with the  
15 Hon. Randall J. Newsome (Ret.) in Los Angeles in connection with the above captioned  
16 adversary case. The mediation did not conclude in a settlement, however, the  
17 Parties continued to discuss settlement post-mediation and they have resolved the  
18 Adversary Case.

19           5.       The Adversary Case is now fully resolved via written agreement.

20           6.       Based on the foregoing, the Defendant and Plaintiff hereby agree, stipulate  
21 and respectfully request that this Court enter its Order as follows:

- 22                   a. The Preliminary Junction Motion shall be dismissed;  
23                   b. The Adversary Case shall be dismissed;  
24                   c. The Tax Revenues are hereby no longer sequestered and may be  
25                   disbursed without further Order of this Court; and  
26                   d. Each party shall bear their own fees and costs.

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Dated:

WAGNER JONES HELSLEY, PC

By:

**Oliver W. Wanger**, Attorneys for Vi Healthcare  
Finance, Inc. and Healthcare Conglomerate  
Associates, LLC

Dated: 3/26/2020

JEFFREY S. SHINBROT, APLC

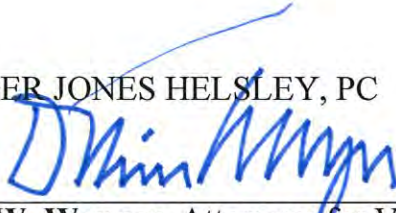
By:

**JEFFREY S. SHINBROT**, Special  
Litigation Counsel for Southern Inyo  
Healthcare District

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Dated: March 25, 2020

WANGER JONES HELSLEY, PC

By:   
**Oliver W. Wanger**, Attorneys for Vi Healthcare  
Finance, Inc. and Healthcare Conglomerate  
Associates, LLC

Dated: March 24, 2020

JEFFREY S. SHINBROT, APLC

By: \_\_\_\_\_  
**JEFFREY S. SHINBROT**, Special  
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Healthcare District